

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,

Petitioner,

v.

FINTIV, INC.,

Patent Owner

IPR2022-00976

U.S. Patent No. 9,892,386

**PETITION FOR *INTER PARTES* REVIEW
UNDER 35 U.S.C. § 312 AND 37 C.F.R. § 42.104**

TABLE OF CONTENTS

I. MANDATORY NOTICES UNDER 37 C.F.R. § 42.8	1
A. Real Party-in-Interest.....	1
B. Related Matters.....	1
C. Lead and Back-up Counsel and Service Information	1
II. INTRODUCTION.....	2
III. GROUNDS FOR STANDING	2
IV. NOTE REGARDING EMPHASIS.....	2
V. THE '386 PATENT	3
A. Overview of '386 Patent.....	3
B. Prosecution History	4
C. Priority Date	4
VI. LEVEL OF ORDINARY SKILL IN THE ART	4
VII. CLAIM CONSTRUCTION.....	5
VIII. IDENTIFICATION OF HOW THE CLAIMS ARE UNPATENTABLE.....	5
A. Statutory Grounds of Challenge and Relief Requested.....	5
B. Summary of Grounds	6
C. Ground 1: Claim 1 would have been obvious over Dill in view of Vadhri, Akashika, and Hansen.	8
1. Overview of Dill.....	8
2. Overview of Vadhri.....	9
3. Overview of Akashika.....	10

4.	Overview of Hansen.....	12
5.	Claim 1	14
	[1.0] A monetary transaction system for conducting monetary transactions between subscribers and other entities, the system comprising one or more of:.....	14
	[1.1.1] an integration tier operable to manage mobile wallet sessions,.....	16
	[1.1.2] the integration tier also including a communication application programming interface (API) and other communication mechanisms to accept messages from channels;.....	18
	[1.2] notification services operable to send notifications through different notification channels including one or more of short message peer-to-peer, short-message services and simple mail transfer protocol emails;	25
	[1.3] business process services operable to implement business workflows, including at least one of executing financial transactions, auditing financial transactions, invoking third-party services, handling errors, and logging platform objects;	27
	[1.4] database services operable to store financial transaction details, store customer profiles, and manage money containers;	31
	[1.5] a payment handler service operable to use APIs of different payment processors including one or more APIs of banks, credit and debit cards processors, bill payment processors;.....	33
	[1.6] a rules engine operable to gather financial transaction statistics and use the gathered financial transaction statistics to enforce constraints including transaction constraints;	40

[1.7] a security service operable to perform subscriber authentication;.....	42
[1.8] at least one entity that is to be involved in the specified transaction, the at least one entity having a profile with the monetary transaction system: wherein the at least one entity is the agent;	45
[1.9.1] wherein the monetary transaction system is implemented to deposit funds at an agent branch,.....	48
[1.9.2] the funds being deposited by a subscriber at the agent branch using a mobile device configured to run a monetary transaction system application, the monetary transaction system performing the following steps:.....	49
[1.10.1] receiving a communication message from the mobile device over one of a plurality of channels connected to the monetary transaction system,.....	52
[1.10.2] the communication message being received by an API associated with the integration tier of the monetary transaction system,.....	54
[1.10.3] the communication message indicating that the subscriber desires to deposit a specified amount of funds into the subscriber's account;	56
[1.10.4] validating the status of the subscriber's account, wherein validating the status of the subscriber's account comprises communicating from the integration tier to the database services to query attributes of the subscriber's account;	58
[1.10.5] committing a pending transaction through the business process services,.....	60
[1.10.6] wherein the integration tier communicates a transaction commitment request to the business process services;.....	61

[1.10.7] receiving a confirmation from the business process services that the pending transaction has been committed;....	62
[1.10.8] sending, through the notification services, a receipt notification to the mobile device; and	63
[1.10.9] upon receiving a confirmation of commitment from the business process services, committing the pending transaction to the database services; and	64
[1.11.1] wherein committing the pending transaction further comprises the following steps as orchestrated by the business process services:	68
[1.11.2] ensuring, via the database services, that the subscriber has an active account;	68
[1.11.3] validating, through communication with the security services, one or more of a PIN number and an access control list;	69
[1.11.4] applying with the rules engine, velocity rules;.....	73
[1.11.5] creating with the database services a new pending transaction history record;	78
[1.11.6] holding funds from the agent account balance using the payment handler,.....	79
[1.11.7] loading the funds to the subscriber account using the payment handler; and.....	81
[1.11.8] updating, using the database services, a pending transaction history record to reflect the funds.	83
D. Grounds 1 and 2: claim 2 would have been obvious over Dill in view of Vadhri, Akashika, Hansen, and Liao (Ground 2); claim 3 would have been obvious over Dill in view of Vadhri, Akashika, and Hansen (Ground 1).	84
1. Claims 2 and 3.....	84

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.